

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

CARL FLEMING

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-CV-283-TSL-RHW

**ALFA INSURANCE CORPORATION,
ROBERT McCALEB, JOHN DOE ENTITIES 1-5,
and JOHN DOE PERSONS**

DEFENDANTS

**DESIGNATION OF EXPERTS BY
DEFENDANT ALFA INSURANCE CORPORATION**

COMES NOW, Defendant Alfa Insurance Corporation (“Alfa”), by and through its counsel of record and files this, its Designation of Experts, who may be called to render expert opinions during the trial of this case:

1. Recognizing that Plaintiff has not designated an expert witness in this case, and that the deadline for Plaintiff to do so has passed, Defendant reserves the right to call as an expert witness the following:

- a. any person who is identified in discovery by any party in this litigation as a person with knowledge of relevant facts and who possesses the requisite qualifications to testify about scientific, technical, or other specialized knowledge, that would assist the trier of fact to understand the evidence or determine a fact in issue in this case; and
- b. un-designated rebuttal expert witnesses, whose testimony cannot be foreseen until the presentation of the evidence against it.

2. Defendant reserves the right to substitute any expert witness disclosed herein with a witness or witnesses of similar qualifications should such substitution be necessary by reason of unforeseen circumstances such as the scheduling of the trial, the health of any expert witness disclosed herein, other professional commitments of any expert witness disclosed herein, or any other matter requiring substitution.

3. Defendant reserves the right to supplement or amend this designation should the Plaintiff designate an expert witness.

4. Defendant reserves the right to supplement or amend this designation within the time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties or pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

Respectfully submitted, this the 31st day of January, 2017.

ALFA INSURANCE CORPORATION

BY: /s/ Ronnie L. Walton

RONNIE L. WALTON

Its Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2016, I electronically filed the foregoing *Designation of Experts by Defendant Alfa Insurance Corporation* with the Clerk of the Court using the ECF System which sent notification of such filing to the following:

Alton E. Peterson, Esq.
STAMPS AND STAMPS
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Attorney for Plaintiff

This, the 31st day of January, 2017.

/s/ Ronnie L. Walton
RONNIE L. WALTON